

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

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In re:

PROMESA  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS<sup>1</sup>

THE COMMONWEALTH OF PUERTO RICO,

Debtor.

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**NOTICE OF REQUEST TO BE HEARD  
AT MAY 17, 2017, HEARING**

The undersigned, as counsel to the Ad Hoc Committee for the Protection of Accrued Retirement Benefits of Puerto Rico's Public Employees and Retirees (the "Ad Hoc Retiree Committee"),<sup>2</sup> pursuant to the Court's Order entered on May 11, 2017 [Dkt. No. 58] (the "Order"), hereby submit their Request to Be Heard at May 17, 2017, Hearing. In support of this Request, the undersigned state as follows:

1. On May 3, 2017, the Financial Oversight and Management Board appointed under the Puerto Rico Oversight, Management, and Economic Stability Act, 48 U.S.C. § 2101, *et seq.* ("PROMESA"), filed a petition in this Court, on behalf of the Commonwealth of Puerto

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<sup>1</sup> Pursuant to the *Notice of Transfer of Docket* [Dkt. No. 62], for administration purposes only, the public docket in the above-captioned case will be maintained on the Case Management/Electronic Case Files system of the United States Bankruptcy Court for the District of Puerto Rico. For the Commonwealth of Puerto Rico, Bankruptcy Case No. 17 BK 3283 has been opened and will correspond to the existing case no. 17 CV 1578.

<sup>2</sup> In Spanish, the Ad Hoc Retiree Committee is known as the "Movimiento Pro Pensionados."

Rico (the “Debtor”), commencing a case under Title III of PROMESA, 48 U.S.C. §§ 2161, *et seq.*

2. On May 5, 2017, the Ad Hoc Retiree Committee filed its *Motion for Entry of an Order Pursuant to 48 U.S.C. § 2161 and 11 U.S.C. § 1102 Directing the Appointment of an Official Retiree Committee and Appointing the Pre-Petition Ad Hoc Retiree Committee as the Official Retiree Committee* [Dkt. No. 8] (the “Retiree Committee Motion”), requesting the entry of an order directing the United States Trustee for Region 21 (the “U.S. Trustee”) to appoint an official retiree committee and, specifically, to appoint the members of the Ad Hoc Retiree Committee to serve as the members of the official retiree committee, pursuant to 11 U.S.C. §§ 1102(a)(2) and (b)(1) and PROMESA § 161(a) (48 U.S.C. § 2161(a)). According to the docket, the deadline for responses to the Retiree Committee Motion is May 19, 2017.

3. The first-day hearings in this case have been scheduled for May 17, 2017. In order to be heard at those hearings, the Order requires counsel to file a Request to Be Heard, describing the matters on which counsel wishes to be heard.

4. The Order indicates that, in addition to addressing the motions filed by the Debtor docketed as item numbers 41, 42, 43, 44, and 45 (the “Debtor’s Motions”), the Court will receive a status report from the U.S. Trustee “relating to the formation of committees.” The Order also requires a status report from the Debtor regarding various matters, including “whether the initiation of a formal mediation process in the near term would be helpful”. Further, the Order requests that counsel for the Debtor prepare and provide an agenda for the May 17, 2017 hearings by May 16, 2017, at 10:00 a.m.

5. The undersigned counsel have filed this Request in order to be heard at the May 17 hearings, as appropriate, with respect to any matter that is presented to or addressed by the

Court that may impact directly or indirectly or relate in any way to: (a) the appointment of an official retiree committee; (b) the participation of active employees and retirees specifically in their capacity as holders of accrued retirement benefits (collectively, the “Retirees”) in mediation or any other proceedings in this case; or (c) the accrued retirement benefits of the Retirees. Similarly, the undersigned counsel wish to be heard on matters that may affect notice to or the administration of the prospective official retiree committee pursuant to the Debtor’s Motions.

Dated: May 12, 2017

Respectfully submitted,

BENNAZAR, GARCIA & MILIAN, C.S.P.

/s/ A.J. Bennazar-Zequeira

A.J. Bennazar-Zequeira  
Hector M. Mayol-Kauffmann  
Edificio Union Plaza, PH-A  
416 Ave. Ponce de Leon  
Hato Rey, Puerto Rico 00918  
Telephone: (787) 754-9191  
Facsimile: (787) 764-3101  
[ajb@bennazar.org](mailto:ajb@bennazar.org)

- and –

CLARK HILL PLC

/s/ Robert D. Gordon

Robert D. Gordon  
*(Pro Hac Vice Admission Pending)*  
151 South Old Woodward Ave., Ste. 200  
Birmingham, Michigan 48009  
Telephone: (248) 988-5882  
Facsimile: (248) 988-2502  
[rgordon@clarkhill.com](mailto:rgordon@clarkhill.com)

*Co-Counsel to the Ad Hoc Retiree Committee*